

MS4 SWPPP Application for Reauthorization

for the NPDES/SDS General Small Municipal Separate
Storm Sewer System (MS4) Permit MNR040000
reissued with an effective date of August 1, 2013
Stormwater Pollution Prevention Program (SWPPP) Document

Doc Type: Permit Application

Instructions: This application is for authorization to discharge stormwater associated with Municipal Separate Storm Sewer Systems (MS4s) under the National Pollutant Discharge Elimination System/State Disposal System (NPDES/SDS) Permit Program. **No fee** is required with the submittal of this application. Please refer to "Example" for detailed instructions found on the Minnesota Pollution Control Agency (MPCA) MS4 website at <http://www.pca.state.mn.us/ms4>.

Submittal: This MS4 SWPPP Application for Reauthorization form must be submitted electronically via e-mail to the MPCA at ms4permitprogram.pca@state.mn.us from the person that is duly authorized to certify this form. All questions with an asterisk (*) are required fields. All applications will be returned if required fields are not completed.

Questions: Contact Claudia Hochstein at 651-757-2881 or claudia.hochstein@state.mn.us, Dan Miller at 651-757-2246 or daniel.miller@state.mn.us, or call toll-free at 800-657-3864.

General Contact Information (*Required fields)

MS4 Owner (with ownership or operational responsibility, or control of the MS4)

*MS4 permittee name: City of Forest Lake *County: Washington
(city, county, municipality, government agency or other entity)
*Mailing address: 220 Lake Street North
*City: Forest Lake *State: MN *Zip code: 55025
*Phone (including area code): 651-464-3500 *E-mail: chantal@ci.forest-lake.mn.us

MS4 General contact (with Stormwater Pollution Prevention Program [SWPPP] implementation responsibility)

*Last name: Borglund *First name: Doug
(department head, MS4 coordinator, consultant, etc.)
*Title: Community Development Director
*Mailing address: 21350 Forest Lake Blvd N.
*City: Forest Lake *State: MN *Zip code: 55025
*Phone (including area code): 651-209-9734 *E-mail: Doug.Borglund@ci.forest-lake.mn.us

Preparer information (complete if SWPPP application is prepared by a party other than MS4 General contact)

Last name: Olson First name: Timothy
(department head, MS4 coordinator, consultant, etc.)
Title: PE, CFM
Mailing address: 2035 County Road D East, Suite B
City: Maplewood State: MN Zip code: 55109
Phone (including area code): 651-704-9970 E-mail: timol@bolton-menk.com

Verification

1. I seek to continue discharging stormwater associated with a small MS4 after the effective date of this Permit, and shall submit this MS4 SWPPP Application for Reauthorization form, in accordance with the schedule in Appendix A, Table 1, with the SWPPP document completed in accordance with the Permit (Part II.D.). ☒ Yes
2. I have read and understand the NPDES/SDS MS4 General Permit and certify that we intend to comply with all requirements of the Permit. ☒ Yes

Certification (All fields are required)

- ☒ Yes - I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted.

I certify that based on my inquiry of the person, or persons, who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

I am aware that there are significant penalties for submitting false information, including the possibility of civil and criminal penalties.

This certification is required by Minn. Stat. §§ 7001.0070 and 7001.0540. The authorized person with overall, MS4 legal responsibility must certify the application (principal executive officer or a ranking elected official).

By typing my name in the following box, I certify the above statements to be true and correct, to the best of my knowledge, and that this information can be used for the purpose of processing my application.

Name: Doug Borglund
(This document has been electronically signed)

Title: Community Development Director Date (mm/dd/yyyy): 12/18/2013

Mailing address: 21350 Forest Lake Blvd N.

City: Forest Lake State: MN Zip code: 55038

Phone (including area code): 651-209-9734 E-mail: Doug.Borglund@ci.forest-lake.mn.us

Note: The application will not be
processed without certification.

Stormwater Pollution Prevention Program Document

I. Partnerships: (Part II.D.1)

- A. List the **regulated small MS4(s)** with which you have established a partnership in order to satisfy one or more requirements of this Permit. Indicate which Minimum Control Measure (MCM) requirements or other program components that each partnership helps to accomplish (List all that apply). Check the box below if you currently have no established partnerships with other regulated MS4s. If you have more than five partnerships, hit the tab key after the last line to generate a new row.

☐ No partnerships with regulated small MS4s

Name and description of partnership	MCM/Other permit requirements involved
Rice Creek Watershed District	MCM 1 – Public Education and Outreach
Comfort Lake Forest Lake Watershed District	MCM 1 – Public Education and Outreach
Washington County Conservation District	MCM 1 – Public Education and Outreach

- B. If you have additional information that you would like to communicate about your partnerships with other regulated small MS4(s), provide it in the space below, or include an attachment to the SWPPP Document, with the following file naming convention: *MS4NameHere_Partnerships*.

II. Description of Regulatory Mechanisms: (Part II.D.2)

Illicit discharges

- A. Do you have a regulatory mechanism(s) that effectively prohibits non-stormwater discharges into your small MS4, except those non-stormwater discharges authorized under the Permit (Part III.D.3.b.)? ☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

☐ Ordinance ☐ Contract language
☒ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City of Forest Lake Ordinance No. 581

Direct link:

<http://www.ci.forest-lake.mn.us/vertical/sites/%7BAFEB969B-C92D-4FE4-A096-00560D784D07%7D/uploads/%7B18F4722D-772D-43A2-B251-9B36695958E4%7D.PDF>

☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_IDDEreg*.

2. If **no**:

Describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

The City of Forest Lake currently has ordinances in place that effectively prohibit non-stormwater discharges but does not define the term "non-stormwater." The City will include a definition of the term in the ordinance within 12 months of application approval.

Construction site stormwater runoff control

- A. Do you have a regulatory mechanism(s) that establishes requirements for erosion and sediment controls and waste controls? ☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits
☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City of Forest Lake Ordinance - 151.08 Minimum Construction Site Best Management Practices

Direct link:

<http://www.ci.forest-lake.mn.us/vertical/sites/%7BAFEB969B-C92D-4FE4-A096-00560D784D07%7D/uploads/%7BE2F31879-F829-4A02-AEAB-DB1D921EFE35%7D.PDF>

- ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_CSWreg*.

- B. Is your regulatory mechanism at least as stringent as the MPCA general permit to Discharge Stormwater Associated with Construction Activity (as of the effective date of the MS4 Permit)? ☐ Yes ☒ No

If you answered **yes** to the above question, proceed to C.

If you answered **no** to either of the above permit requirements listed in A. or B., describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City's existing ordinance will be reviewed to determine what changes need to be made in order to bring the code up to compliance with the 2013 general construction permit. This action will occur within 12 months from the approval date of this application

- C. Answer **yes** or **no** to indicate whether your regulatory mechanism(s) requires owners and operators of construction activity to develop site plans that incorporate the following erosion and sediment controls and waste controls as described in the Permit (Part III.D.4.a.(1)-(8)), and as listed below:

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| 1. Best Management Practices (BMPs) to minimize erosion. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2. BMPs to minimize the discharge of sediment and other pollutants. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 3. BMPs for dewatering activities. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 4. Site inspections and records of rainfall events | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 5. BMP maintenance | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 6. Management of solid and hazardous wastes on each project site. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| 7. Final stabilization upon the completion of construction activity, including the use of perennial vegetative cover on all exposed soils or other equivalent means. | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 8. Criteria for the use of temporary sediment basins. | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

The City will follow MPCA Construction Stormwater Permit to update the Construction Site Stormwater Management ordinance within 12 months of the approval date of this application.

Post-construction stormwater management

- A. Do you have a regulatory mechanism(s) to address post-construction stormwater management activities? ☒ Yes ☐ No

1. If **yes**:

- a. Check which *type* of regulatory mechanism(s) your organization has (check all that apply):

- ☒ Ordinance ☐ Contract language
☐ Policy/Standards ☐ Permits

- ☐ Rules
☐ Other, explain: _____

- b. Provide either a direct link to the mechanism selected above or attach it as an electronic document to this form; or if your regulatory mechanism is either an Ordinance or a Rule, you may provide a citation:

Citation:

City of Forest Lake Ordinance - 151.08.I Storm water management criteria for permanent facilities

Direct link:

<http://www.ci.forest-lake.mn.us/vertical/sites/%7BAFEB969B-C92D-4FE4-A096-00560D784D07%7D/uploads/%7BE2F31879-F829-4A02-AEAB-DB1D921EFE35%7D.PDF>

- ☐ Check here if attaching an electronic copy of your regulatory mechanism, with the following file naming convention: *MS4NameHere_PostCSWreg*.

- B. Answer **yes** or **no** below to indicate whether you have a regulatory mechanism(s) in place that meets the following requirements as described in the Permit (Part III.D.5.a.):

1. **Site plan review:** Requirements that owners and/or operators of construction activity submit site plans with post-construction stormwater management BMPs to the permittee for review and approval, prior to start of construction activity. ☒ Yes ☐ No
2. **Conditions for post construction stormwater management:** Requires the use of any combination of BMPs, with highest preference given to Green Infrastructure techniques and practices (e.g., infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc.), necessary to meet the following conditions on the site of a construction activity to the Maximum Extent Practicable (MEP):
 - a. For new development projects – no net increase from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of Total Suspended Solids (TSS).
 - 3) Stormwater discharges of Total Phosphorus (TP).
 - b. For redevelopment projects – a net reduction from pre-project conditions (on an annual average basis) of: ☐ Yes ☒ No
 - 1) Stormwater discharge volume, unless precluded by the stormwater management limitations in the Permit (Part III.D.5.a(3)(a)).
 - 2) Stormwater discharges of TSS.
 - 3) Stormwater discharges of TP.
3. **Stormwater management limitations and exceptions:**
 - a. Limitations
 - 1) Prohibit the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) when the infiltration structural stormwater BMP will receive discharges from, or be constructed in areas: ☐ Yes ☒ No
 - a) Where industrial facilities are not authorized to infiltrate industrial stormwater under an NPDES/SDS Industrial Stormwater Permit issued by the MPCA.
 - b) Where vehicle fueling and maintenance occur.
 - c) With less than three (3) feet of separation distance from the bottom of the infiltration system to the elevation of the seasonally saturated soils or the top of bedrock.
 - d) Where high levels of contaminants in soil or groundwater will be mobilized by the infiltrating stormwater.
 - 2) Restrict the use of infiltration techniques to achieve the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), without higher engineering review, sufficient to provide a functioning treatment system and prevent adverse impacts to groundwater, when the infiltration device will be constructed in areas: ☐ Yes ☒ No
 - a) With predominately Hydrologic Soil Group D (clay) soils.
 - b) Within 1,000 feet up-gradient, or 100 feet down-gradient of active karst features.
 - c) Within a Drinking Water Supply Management Area (DWSMA) as defined in Minn. R. 4720.5100, subp. 13.
 - d) Where soil infiltration rates are more than 8.3 inches per hour.
 - 3) For linear projects where the lack of right-of-way precludes the installation of volume control practices that meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)), the permittee's regulatory mechanism(s) may allow ☐ Yes ☒ No

exceptions as described in the Permit (Part III.D.5.a(3)(b)). The permittee's regulatory mechanism(s) shall ensure that a reasonable attempt be made to obtain right-of-way during the project planning process.

4. **Mitigation provisions:** The permittee's regulatory mechanism(s) shall ensure that any stormwater discharges of TSS and/or TP not addressed on the site of the original construction activity are addressed through mitigation and, at a minimum, shall ensure the following requirements are met:

- a. Mitigation project areas are selected in the following order of preference: ☐ Yes ☒ No
- 1) Locations that yield benefits to the same receiving water that receives runoff from the original construction activity.
 - 2) Locations within the same Minnesota Department of Natural Resource (DNR) catchment area as the original construction activity.
 - 3) Locations in the next adjacent DNR catchment area up-stream
 - 4) Locations anywhere within the permittee's jurisdiction.
- b. Mitigation projects must involve the creation of new structural stormwater BMPs or the retrofit of existing structural stormwater BMPs, or the use of a properly designed regional structural stormwater BMP. ☐ Yes ☒ No
- c. Routine maintenance of structural stormwater BMPs already required by this permit cannot be used to meet mitigation requirements of this part. ☐ Yes ☒ No
- d. Mitigation projects shall be completed within 24 months after the start of the original construction activity. ☐ Yes ☒ No
- e. The permittee shall determine, and document, who will be responsible for long-term maintenance on all mitigation projects of this part. ☐ Yes ☒ No
- f. If the permittee receives payment from the owner and/or operator of a construction activity for mitigation purposes in lieu of the owner or operator of that construction activity meeting the conditions for post-construction stormwater management in Part III.D.5.a(2), the permittee shall apply any such payment received to a public stormwater project, and all projects must be in compliance with Part III.D.5.a(4)(a)-(e). ☐ Yes ☒ No

5. **Long-term maintenance of structural stormwater BMPs:** The permittee's regulatory mechanism(s) shall provide for the establishment of legal mechanisms between the permittee and owners or operators responsible for the long-term maintenance of structural stormwater BMPs not owned or operated by the permittee, that have been implemented to meet the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)). This only includes structural stormwater BMPs constructed after the effective date of this permit and that are directly connected to the permittee's MS4, and that are in the permittee's jurisdiction. The legal mechanism shall include provisions that, at a minimum:

- a. Allow the permittee to conduct inspections of structural stormwater BMPs not owned or operated by the permittee, perform necessary maintenance, and assess costs for those structural stormwater BMPs when the permittee determines that the owner and/or operator of that structural stormwater BMP has not conducted maintenance. ☐ Yes ☒ No
- b. Include conditions that are designed to preserve the permittee's right to ensure maintenance responsibility, for structural stormwater BMPs not owned or operated by the permittee, when those responsibilities are legally transferred to another party. ☐ Yes ☒ No
- c. Include conditions that are designed to protect/preserve structural stormwater BMPs and site features that are implemented to comply with the Permit (Part III.D.5.a(2)). If site configurations or structural stormwater BMPs change, causing decreased structural stormwater BMP effectiveness, new or improved structural stormwater BMPs must be implemented to ensure the conditions for post-construction stormwater management in the Permit (Part III.D.5.a(2)) continue to be met. ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within twelve (12) months of the date permit coverage is extended, these permit requirements are met:

A post-construction storm water ordinance that addresses the requirements of Minimum Control Measure 5 will be prepared within 12 months from the date of application approval.

III. Enforcement Response Procedures (ERPs): (Part II.D.3)

- A. Do you have existing ERPs that satisfy the requirements of the Permit (Part III.B.)? ☐ Yes ☒ No

1. If **yes**, attach them to this form as an electronic document, with the following file naming convention: *MS4NameHere_ERPs*.
2. If **no**, describe the tasks and corresponding schedules that will be taken to assure that, with twelve (12) months of the date permit coverage is extended, these permit requirements are met:
Within 12 months from the date of application approval the City will develop ERPs that address illicit discharge.

B. Describe your ERPs:

IV. Storm Sewer System Map and Inventory: (Part II.D.4.)

A. Describe how you manage your storm sewer system map and inventory:

The storm sewer map is updated annually as new development or redevelopment occurs.

B. Answer **yes** or **no** to indicate whether your storm sewer system map addresses the following requirements from the Permit (Part III.C.1.a-d), as listed below:

1. The permittee's entire small MS4 as a goal, but at a minimum, all pipes 12 inches or greater in diameter, including stormwater flow direction in those pipes. ☐ Yes ☒ No
2. Outfalls, including a unique identification (ID) number assigned by the permittee, and an associated geographic coordinate. ☐ Yes ☒ No
3. Structural stormwater BMPs that are part of the permittee's small MS4. ☐ Yes ☒ No
4. All receiving waters. ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Most of the existing system has been inventoried, but is incomplete in newly developed areas. The City will complete the inventory of its pipes 12 inches or larger and system outfalls, including a unique ID number, from recent development within 12 months from the date of application approval.

C. Answer **yes** or **no** to indicate whether you have completed the requirements of 2009 Minnesota Session Law, Ch. 172, Sec. 28: with the following inventories, according to the specifications of the Permit (Part III.C.2.a.-b.), including:

1. All ponds within the permittee's jurisdiction that are constructed and operated for purposes of water quality treatment, stormwater detention, and flood control, and that are used for the collection of stormwater via constructed conveyances. ☐ Yes ☒ No
2. All wetlands and lakes, within the permittee's jurisdiction, that collect stormwater via constructed conveyances. ☒ Yes ☐ No

D. Answer **yes** or **no** to indicate whether you have completed the following information for each feature inventoried.

1. A unique identification (ID) number assigned by the permittee. ☒ Yes ☐ No
2. A geographic coordinate. ☒ Yes ☐ No
3. Type of feature (e.g., pond, wetland, or lake). This may be determined by using best professional judgment. ☒ Yes ☐ No

If you have answered **yes** to all above requirements, and you have already submitted the Pond Inventory Form to the MPCA, then you do not need to resubmit the inventory form below.

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Most of the existing system has been inventoried, but is incomplete in newly developed areas. The City will complete the inventory of its ponds, including a unique ID number, from recent development within 12 months from the date of application approval.

E. Answer **yes** or **no** to indicate if you are attaching your pond, wetland and lake inventory to the MPCA on the form provided on the MPCA website at: <http://www.pca.state.mn.us/ms4>, according to the specifications of Permit (Part III.C.2.b.(1)-(3)). Attach with the following file naming convention: *MS4NameHere_inventory*. ☐ Yes ☒ No

If you answered **no**, the inventory form must be submitted to the MPCA MS4 Permit Program within 12 months of the date permit coverage is extended.

V. Minimum Control Measures (MCMs) (Part II.D.5)

A. MCM1: Public education and outreach

1. The Permit requires that, within 12 months of the date permit coverage is extended, existing permittees revise their education and outreach program that focuses on illicit discharge recognition and reporting, as well as other specifically selected stormwater-related issue(s) of high priority to the permittee during this permit term. Describe your **current** educational program, including **any high-priority topics included**:

The City's goal is to educate the public regarding the value of the surrounding natural resources, to connect the people with stormwater management system, provide a sense of BMP ownership through interactive programs, and improve the health and well being of its citizens.

2. List the categories of BMPs that address your public education and outreach program, including the distribution of educational materials and a program implementation plan. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the U.S. Environmental Protection Agency's (EPA) *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Local Access Cable Channel	Number of times annually City Council Meetings are aired, Ongoing and existing, updated and revised as necessary
City Website – Stormwater Information Posted on City Website	Number of stormwater related articles and links generated annually, Review existing website to ensure most current information is available, solicit additional information to ensure any educational gaps are closed, ongoing and existing, updated and revised as necessary
Stormwater Educational Brochures	Number of brochures distributed annually, types of brochures distributed, Ongoing and existing, distribute brochures and update and revise as necessary
City News Letter	Number of stormwater articles distributed annually, distribution frequency, number of households, distribute articles, update and revise and necessary
BMP categories to be implemented	Measurable goals and timeframes
Update City Website with new MS4 information, SWPPP, and TMDL goals	Newly linked articles, ongoing updates and revision as needed, Update website with new MS4 information upon approval of the reapplication and public comment, Post updated SWPPP on website within 3 months of reapplication approval
Update brochures	MS4 sections updated, updated sections, ongoing updates and revisions as needed, Track number of brochures distributed annually

3. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Doug Borglund, Community Development Director

B. MCM2: Public participation and involvement

1. The Permit (Part III.D.2.a.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement a public participation/involvement program to solicit public input on the SWPPP. Describe your current program:

The City hosts an annual public meeting to discuss the MS4 permit, the activities that have occurred to improve water quality over the previous year, and details regarding future activities. The public is invited to attend where they are given the opportunity to provide input. Notice of the meeting is distributed 30-days prior. The City provides its citizens to submit written responses to the SWPPP and other water quality activities. There are numerous volunteer programs in place to connect the community to its natural and environmental resources. The City also has programs in place to track community

complaints and methods for resolving those issues.

- List the categories of BMPs that address your public participation/involvement program, including solicitation and documentation of public input on the SWPPP. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Annual Home Show	Number of citizens contacted annually, number of brochures distributed annually, other stormwater related materials distributed annually, review information to be displayed and distributed, ongoing and existing, update and revise as necessary
Annual Stormwater Meeting, 30-day Public Notice	Public Notice 30 days prior to annual meeting, locations of posted notice, Annually, posted 30-days prior to annual meeting
Joint Educational Programs with Outside Entities	Coordination with outside entities, ongoing and existing, review and update as necessary
Complaint Tracking Program	Number of complaints and resolutions annually, ongoing as complaints are submitted, resolution as soon as possible
Volunteer Program	Number of people participating at stormwater events annually
Consideration of Written and Oral Public Input	Public comment received annually, SWPPP/policy revisions based on public comment, ongoing and existing based on comments received
SWPPP Availability	The SWPPP is currently available via the City's website,
BMP categories to be implemented	Measurable goals and timeframes
SWPPP Availability	Provide hard copy of SWPPP document at public library and City Hall, within 12 months of approval

- Do you have a process for receiving and documenting citizen input? ☒ Yes ☐ No

If you answered **no** to the above permit requirement, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:

- Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Doug Borglund, Community Development Director

C. MCM 3: Illicit discharge detection and elimination

- The Permit (Part III.D.3.) requires that, within 12 months of the date permit coverage is extended, existing permittees revise their current program as necessary, and continue to implement and enforce a program to detect and eliminate illicit discharges into the small MS4. Describe your current program:

The City currently regulates illicit discharge using their current City Ordinance and in the Illicit Discharge Detection and Elimination Plan. There are educational opportunities provided to the public regarding illicit discharges and illegal storm sewer connections. The City has enforcement practices in place. A storm sewer map has been generated and is continuously updated that locates pipes, ditches, streams, lakes, ponds, structural pollution control devices, outfalls and discharge points.

- Does your Illicit Discharge Detection and Elimination Program meet the following requirements, as found in the Permit (Part III.D.3.c-g.)?

- Incorporation of illicit discharge detection into all inspection and maintenance activities conducted ☒ Yes ☐ No under the Permit (Part III.D.6.e-f.) Where feasible, illicit discharge inspections shall be conducted

during dry-weather conditions (e.g., periods of 72 or more hours of no precipitation).

- b. Detecting and tracking the source of illicit discharges using visual inspections. The permittee may also include use of mobile cameras, collecting and analyzing water samples, and/or other detailed procedures that may be effective investigative tools. ☒ Yes ☐ No
- c. Training of all field staff, in accordance with the requirements of the Permit (Part III.D.6.g.(2)), in illicit discharge recognition (including conditions which could cause illicit discharges), and reporting illicit discharges for further investigation. ☒ Yes ☐ No
- d. Identification of priority areas likely to have illicit discharges, including at a minimum, evaluating land use associated with business/industrial activities, areas where illicit discharges have been identified in the past, and areas with storage of large quantities of significant materials that could result in an illicit discharge. ☐ Yes ☒ No
- e. Procedures for the timely response to known, suspected, and reported illicit discharges. ☒ Yes ☐ No
- f. Procedures for investigating, locating, and eliminating the source of illicit discharges. ☒ Yes ☐ No
- g. Procedures for responding to spills, including emergency response procedures to prevent spills from entering the small MS4. The procedures shall also include the immediate notification of the Minnesota Department of Public Safety Duty Officer, if the source of the illicit discharge is a spill or leak as defined in Minn. Stat. § 115.061. ☒ Yes ☐ No
- h. When the source of the illicit discharge is found, the permittee shall use the ERPs required by the Permit (Part III.B.) to eliminate the illicit discharge and require any needed corrective action(s). ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Within 12 months of permit approval, the City will finalize it's stormwater management system to identify locations that have a higher potential for illicit discharges and ensure that ERPs are fully established, update ordinances for proper response procedures for stormwater, and develop ERPs to eliminate illicit dishacrges and develop required corrective actions.

3. List the categories of BMPs that address your illicit discharge, detection and elimination program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Storm Sewer System Map	Percentage of system mapped, number of updates completed to date, Current and ongoing updates to map based on new development
Hazardous Waste Disposal Ordinance	Hazardous waste related articles distributed, ordinance language, adoption of new or updated ordinances,
Nuisance/Illegal Dumping, Illicit Discharge, Detection, and Enforcement Procedure	
Individual Sewage Treatment System Ordinance	Number of systems installed, inspected, and septic systems pumped, ongoing and existing installations
Stormwater System Inspection and Maintenance Program	Number of sediment/pollution control structures cleaned, inspected, and maintained annually, Continuous inspection and record keeping
Public and Employee Illicit Discharge Information Program	Implement programs as described in Public Involvement and Education MCMs
BMP categories to be implemented	Measurable goals and timeframes

4. Do you have procedures for record-keeping within your Illicit Discharge Detection and Elimination (IDDE) program as specified within the Permit (Part III.D.3.h.)? ☒ Yes ☐ No

If you answered **no**, indicate how you will develop procedures for record-keeping of your Illicit Discharge, Detection and Elimination Program, within 12 months of the date permit coverage is extended:

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Doug Borglund, Community Development Director

D. MCM 4: Construction site stormwater runoff control

1. The Permit (Part III.D.4) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a construction site stormwater runoff control program. Describe your current program:

The City currently has two ordinances for construction site stormwater runoff controls. Every applicant for a building permit, subdivision approval, or a permit to allow land disturbing activities must submit a SWPPP to the City. Construction will not begin until the plan has been approved by the City.

2. Does your program address the following BMPs for construction stormwater erosion and sediment control as required in the Permit (Part III.D.4.b.):
- a. Have you established written procedures for site plan reviews that you conduct prior to the start of construction activity? ☒ Yes ☐ No
 - b. Does the site plan review procedure include notification to owners and operators proposing construction activity that they need to apply for and obtain coverage under the MPCA's general permit to *Discharge Stormwater Associated with Construction Activity No. MN R100001*? ☒ Yes ☐ No
 - c. Does your program include written procedures for receipt and consideration of reports of noncompliance or other stormwater related information on construction activity submitted by the public to the permittee? ☒ Yes ☐ No
 - d. Have you included written procedures for the following aspects of site inspections to determine compliance with your regulatory mechanism(s):
 - 1) Does your program include procedures for identifying priority sites for inspection? ☒ Yes ☐ No
 - 2) Does your program identify a frequency at which you will conduct construction site inspections? ☒ Yes ☐ No
 - 3) Does your program identify the names of individual(s) or position titles of those responsible for conducting construction site inspections? ☒ Yes ☐ No
 - 4) Does your program include a checklist or other written means to document construction site inspections when determining compliance? ☒ Yes ☐ No
 - e. Does your program document and retain construction project name, location, total acreage to be disturbed, and owner/operator information? ☒ Yes ☐ No
 - f. Does your program document stormwater-related comments and/or supporting information used to determine project approval or denial? ☒ Yes ☐ No
 - g. Does your program retain construction site inspection checklists or other written materials used to document site inspections? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

3. List the categories of BMPs that address your construction site stormwater runoff control program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Erosion and Sediment Control Ordinance (Codified and Revised)	Examination of existing ordinances, development of new ordinances based on current MS4 permit, implementation of new and revised ordinances, ongoing implementation of current applicable ordinances, number of ordinance changes tracked annually based on specific regulatory needs, revise and update as needed
Construction Site Waste Control (Ordinance)	Ordinance implementation, revise and update

Erosion and Sediment Control Inspection and Enforcement	Number of inspections annually, program revisions, number of enforcement actions taken based on number of violations found annually, Examine current program, update and revise as needed
Minimum Erosion and Sediment Control BMPs	Number of BMPs developed based on number of regulated construction projects annually, number of contractors provided with list of BMPs, guidance details, revise list based on current BMP guidance, ongoing and existing, review and update as needed
Erosion and Sediment Control Plan Review Process	Number of plans reviewed annually, site plan review requirements, ongoing and existing, update and revise as needed
Pre-Construction Meeting	Number of meetings held annually, number of attendees, ongoing as construction occurs, update agenda items as required
BMP categories to be implemented	Measurable goals and timeframes
Procedures for noncompliance	Write procedures for noncompliance within 12 months from the date of application approval
Identification of priority sites	Update program to include procedures for identifying priority sites for inspection within 12 months from the date of application approval
Frequency of site inspections	Expand program language to include inspection frequency beyond the rainfall driven inspection requirements, update within 12 months from the date of application approval
Checklist for site inspections	Include in program a checklist for conducting site inspections within 12 months from the date of application approval

4. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Doug Borglund, Community Development Director

Mike Tate, Public Works Director

E. MCM 5: Post-construction stormwater management

1. The Permit (Part III.D.5.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement and enforce a post-construction stormwater management program. Describe your current program:

The City's ordinance for Stormwater Management Criteria for Permanent Facilities and Stormwater Management Plan defines the requirements for post-construction stormwater management for land disturbing, development and redevelopment activities.

2. Have you established written procedures for site plan reviews that you will conduct prior to the start of construction activity? ☒ Yes ☐ No
3. Answer **yes** or **no** to indicate whether you have the following listed procedures for documentation of post-construction stormwater management according to the specifications of Permit (Part III.D.5.c.):
- a. Any supporting documentation that you use to determine compliance with the Permit (Part III.D.5.a), including the project name, location, owner and operator of the construction activity, any checklists used for conducting site plan reviews, and any calculations used to determine compliance? ☒ Yes ☐ No
- b. All supporting documentation associated with mitigation projects that you authorize? ☒ Yes ☐ No
- c. Payments received and used in accordance with Permit (Part III.D.5.a.(4)(f))? ☒ Yes ☐ No
- d. All legal mechanisms drafted in accordance with the Permit (Part III.D.5.a.(5)), including date(s) of the agreement(s) and names of all responsible parties involved? ☒ Yes ☐ No

If you answered **no** to any of the above permit requirements, describe the steps that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met.

4. List the categories of BMPs that address your post-construction stormwater management program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. Refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>). **If you have more than five categories**, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Structural and Non-structural BMP List	Completed list, number of contractors supplied with list, number and type of BMPs installed annually, List updated with newly accepted BMPs within 12 months of permit approval, based on design guidance from MPCA and other organizations
Zoning Ordinance	Completed review and adoption of ordinance within 12 months of permit approval, updated as needed
Shoreland Overlay District	Number of plans reviewed annually, ongoing and existing, reviewed and updated as needed
Woodland Preservation (Ordinance)	Woodlands preserved annually, number of plans reviewed annually, ongoing and existing, reviewed and updated as needed
Lawn Fertilizer and Pesticide Application Control	Number of commercial licenses obtained tracked annually, ordinance enforced, ongoing and existing, reviewed and updated as needed
Stormwater Management Ordinance	Examination of existing ordinances immediately upon permit approval, development of new ordinances to meet current permit regulations within 12 months of permit approval, implementation, ongoing and existing, reviewed and updated as needed
Long-term Operation and Maintenance of Stormwater System	Number of inspections performed annually, number of repairs, replacements, or maintenance measures, number of employees trained for proper O&M annually, Implement corrective measures to MEP, review procedures and revise annually
BMP categories to be implemented	Measurable goals and timeframes
LID and Green Infrastructure	Encourage implementation of LID practices, give highest preference to Green Infrastructure as defined in MS4 and Construction Stormwater Permits, implement within 12 months from the date of application approval
Existing BMP retrofits	Consider modification of existing BMPs to ensure compliance with new permit requirements, enhance existing BMPs with retrofits to improve water quality, develop plan for future BMP retrofits, implement within 12 months from the date of application approval
MN Stormwater Manual and MIDS	Encourage developers to consult the Stormwater Manual on a per-project basis and utilize MIDS calculator for BMP design guidance, enforce immediately upon permit approval

5. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Doug Borglund, Community Development Director

Aaron Buffington, City Planner

Mike Tate, Public Works Director

F. MCM 6: Pollution prevention/good housekeeping for municipal operations

1. The Permit (Part III.D.6.) requires that, within 12 months of the date permit coverage is extended, existing permittees shall revise their current program, as necessary, and continue to implement an operations and maintenance program that prevents or reduces the discharge of pollutants from the permittee owned/operated facilities and operations to the small MS4. Describe your current program:

The City has an operation and maintenance program that includes a training program for municipal operations that is aimed at reducing pollutants from MS4 operations. The City inspects all structural pollution control devices on an annual basis. The City also inspects all MS4 outfalls, sediment basins, and other ponds at a rate of 20% per year.

2. Do you have a facilities inventory as outlined in the Permit (Part III.D.6.a.)? ☒ Yes ☐ No
3. If you answered **no** to the above permit requirement in question 2, describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, this permit requirement is met:
4. List the categories of BMPs that address your pollution prevention/good housekeeping for municipal operations program. Use the first table for categories of BMPs that you have established and the second table for categories of BMPs that you plan to implement over the course of the permit term.

Include the measurable goals with appropriate timeframes that each BMP category will be implemented and completed. In addition, provide interim milestones and the frequency of action in which the permittee will implement and/or maintain the BMPs. For an explanation of measurable goals, refer to the EPA's *Measurable Goals Guidance for Phase II Small MS4s* (<http://www.epa.gov/npdes/pubs/measurablegoals.pdf>).

If you have more than five categories, hit the tab key after the last line to generate a new row.

Established BMP categories	Measurable goals and timeframes
Municipal Employee Training Program	Type of training, number of employees trained annually, Current and ongoing, annually
Street De-Icing Program	New de-icing processes adopted, number attending training annually, evaluate de-icing applications tracked annually, current and ongoing
Municipal Lawn Care Program	Number of employees trained and certified annually, amount of fertilizer applied each year, annual reductions, current and ongoing
Municipal Street Maintenance Program	Length of street swept per sweeping, total tracked annually, evaluate program priority areas and adjust if necessary, implement revised programs when necessary, current and ongoing
Annual Inspection of All Structural BMPs	Number of devices cleaned, inspected, and maintained annually, complete 20% per year, revise inspection and cleaning schedule based on existing MS4 permit implementation, annual
Quarterly Inspection of All Exposed Stockpiles, Storage and Material Handling Areas	Identify stockpiles and other facilities owned and operated by City, conduct quarterly inspections
BMP categories to be implemented	Measurable goals and timeframes
Facility Inventory	Continue to inventory City-owned facilities, Develop and implement BMPs for inventoried facilities and municipal operations, Implement within 12 months of application approval
Pond Assessment Procedures and Schedule	Develop procedures for determining TSS and TP treatment effectiveness of city-owned ponds within 12 months of application approval, implement in years 2-5.

5. Does discharge from your MS4 affect a Source Water Protection Area (Permit Part III.D.6.c.)? ☒ Yes ☐ No
 - a. If **no**, continue to 6.
 - b. If **yes**, the Minnesota Department of Health (MDH) is in the process of mapping the following items. Maps are available at <http://www.health.state.mn.us/divs/eh/water/swp/maps/index.htm>. Is a map including the following items available for your MS4:

- 1) Wells and source waters for drinking water supply management areas identified as vulnerable under Minn. R. 4720.5205, 4720.5210, and 4720.5330? ☒ Yes ☐ No
- 2) Source water protection areas for surface intakes identified in the source water assessments conducted by or for the Minnesota Department of Health under the federal Safe Drinking Water Act, U.S.C. §§ 300j – 13? ☒ Yes ☐ No
- c. Have you developed and implemented BMPs to protect any of the above drinking water sources? ☒ Yes ☐ No
6. Have you developed procedures and a schedule for the purpose of determining the TSS and TP treatment effectiveness of all permittee owned/operated ponds constructed and used for the collection and treatment of stormwater, according to the Permit (Part III.D.6.d.)? ☐ Yes ☒ No
7. Do you have inspection procedures that meet the requirements of the Permit (Part III.D.6.e.(1)-(3)) for structural stormwater BMPs, ponds and outfalls, and stockpile, storage and material handling areas? ☒ Yes ☐ No
8. Have you developed and implemented a stormwater management training program commensurate with each employee's job duties that:
- a. Addresses the importance of protecting water quality? ☐ Yes ☒ No
- b. Covers the requirements of the permit relevant to the duties of the employee? ☒ Yes ☐ No
- c. Includes a schedule that establishes initial training for new and/or seasonal employees and recurring training intervals for existing employees to address changes in procedures, practices, techniques, or requirements? ☒ Yes ☐ No
9. Do you keep documentation of inspections, maintenance, and training as required by the Permit (Part III.D.6.h.(1)-(5))? ☐ Yes ☒ No

If you answered **no** to any of the above permit requirements listed in **Questions 5 – 9**, then describe the tasks and corresponding schedules that will be taken to assure that, within 12 months of the date permit coverage is extended, these permit requirements are met:

Inspection procedures for structural BMPs, ponds and outfalls, and stockpile, storage, and material handling areas will be generated. Procedures for determining the TSS and TP treatment effectiveness of all City-owned ponds will be implemented and procedures for tracking TSS and TP removal effectiveness for all newly constructed BMPs will be implemented. Record keeping procedures associated with these activities will be implemented. City Staff will be trained annually for proper inspection procedures and newly listed BMPs. All items will be accomplished within 12 months of the date of permit coverage.

10. Provide the name or the position title of the individual(s) who is responsible for implementing and/or coordinating this MCM:

Mike Tate, Public Works Director

VI. Compliance Schedule for an Approved Total Maximum Daily Load (TMDL) with an Applicable Waste Load Allocation (WLA) (Part II.D.6.)

- A. Do you have an approved TMDL with a Waste Load Allocation (WLA) prior to the effective date of the Permit? ☒ Yes ☐ No
1. If **no**, continue to section VII.
2. If **yes**, fill out and attach the MS4 Permit TMDL Attachment Spreadsheet with the following naming convention: *MS4NameHere_TMDL*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VII. Alum or Ferric Chloride Phosphorus Treatment Systems (Part II.D.7.)

- A. Do you own and/or operate any Alum or Ferric Chloride Phosphorus Treatment Systems which are regulated by this Permit (Part III.F.)? ☐ Yes ☒ No
1. If **no**, this section requires no further information.
2. If **yes**, you own and/or operate an Alum or Ferric Chloride Phosphorus Treatment System within your small MS4, then you must submit the Alum or Ferric Chloride Phosphorus Treatment Systems Form supplement to this document, with the following naming convention: *MS4NameHere_TreatmentSystem*.

This form is found on the MPCA MS4 website: <http://www.pca.state.mn.us/ms4>.

VIII. Add any Additional Comments to Describe Your Program

TMDL Wasteload Allocation Excel Spreadsheet PART II.D.6.a.-e.

Copy and paste from the Master List MS4 TMDL Spreadsheet for your MS4 to the space below.

Attach this completed form with your SWPPP Document at the time of submittal. At a **minimum**, provide all of the information "" items (TMDL Project Name, Type of WLA, Numeric WLA, Unit, Flow Condition, and Pollutant of Concern).

Permittee name	Preferred ID	TMDL project name*	Waterbody ID	Type of WLA*	Numeric WLA *	Unit*	Percent reduction	Flow condition*	Waterbody name	Pollutant of concern*	Date approved
Forest Lake City	MS400262	Comfort Lake-Forest Lake Watershed District Six Lakes TMDL	13-0054-00	Individual	0.01	lbs/day		N/A	Little Comfort Lake	Phosphorus	6/7/2010
Forest Lake City	MS400262	Comfort Lake-Forest Lake Watershed District Six Lakes TMDL	82-0162-00	Individual	0.049	lbs/day		N/A	Shields Lake	Phosphorus	6/7/2010
Forest Lake City	MS400262	Comfort Lake-Forest Lake Watershed District Six Lakes TMDL	13-0053-00	Individual	1.35	lbs/day		N/A	Comfort Lake	Phosphorus	6/7/2010
Forest Lake City	MS400262	Lake St. Croix Nutrient TMDL	82-0001	Categorical	24.1	lbs/day	34%	N/A	Lake St. Croix	Phosphorus	8/8/2012

✓	
---	--

YES (Provide the following information below)

Table 2

Fill in the following table with your Interim Milestones, BMP IDs, and Implementation Dates. Replace "TMDL Project Name & Pollutant" Columns with each TMDL Project Name and the corresponding pollutant. Then put an "X" in the boxes for the TMDL that corresponds with each BMP. PART II.D.6.f.(1)-(2)

It is recommended to assign each Interim Milestone (BMP) a BMP ID. You will be required to report on the status of each Interim Milestone and include a BMP ID for all structural BMPs as part of the MS4 Annual Report (see Part III.E.), so including those ID numbers at the time of application may be useful in tracking implementation efforts. If a pond that will be included in the pond inventory (Part III.C.2.) is to be applied toward a WLA, use the same ID for both the pond inventory and TMDL tracking. Non-structural BMPs are not required to have an ID, but it may be useful to assign it an ID for internal MS4 recordkeeping.

			Comfort Lake-Forest Lake Watershed District Six Lakes TMDL - Little Comfort Lake, Phosphorus	Comfort Lake-Forest Lake Watershed District Six Lakes TMDL - Shields Lake, Phosphorus	Comfort Lake-Forest Lake Watershed District Six Lakes TMDL - Comfort Lake, Phosphorus	Lake St. Croix Nutrient TMDL - Lake St. Croix, Phosphorus
Interim Milestone (Best Management Practice)	BMP ID	Implementation Date				
Update City Ordinances and Illicit Discharge Detection and Elimination Program for increased phosphorus reduction; update associated training procedures and programs	NSTR-01	6/1/2014	x	x	x	x
Add specific BMPs targeting phosphorus removal to list of highest priority BMPs	NSTR-02	6/1/2014	x	x	x	x
Review short term CIP projects and identify opportunities to add BMPs to street reconstruction projects	NSTR-03	7/1/2014	x	x	x	x
Implement retrofit BMPs with street reconstruction projects as practical and feasible	STR-01	7/1/2016	x	x	x	x
Partner with Watershed Districts to implement BMPs	STR-02	7/1/2016	x	x	x	x
Modify Street Sweeping Plan and implement	STR-03	7/1/2016	x	x	x	x
Implement retrofit BMPs with street reconstruction projects as practical and feasible	STR-04	7/1/2017				

The City will add new BMPs to its list of highest priority BMPs, including a preference for Green Infrastructure techniques; e.g. infiltration, evapotranspiration, reuse/harvesting, conservation design, urban forestry, green roofs, etc. The City will also encourage Low Impact Development (LID) practices where prudent and feasible. The current Stormwater Management Plan (SWMP) contains guidance for water quality practices for reducing Phosphorus and references current TMDLs as of September 2103. In 2015, the City will update the SWMP to report current water quality findings and comply with new watershed district rules.

TMDL Project	Target Date to Achieve WLA
Comfort Lake-Forest Lake Watershed District Six Lakes TMDL - Little Comfort Lake, Phosphorus	2030
Comfort Lake-Forest Lake Watershed District Six Lakes TMDL - Shields Lake, Phosphorus	2030
Comfort Lake-Forest Lake Watershed District Six Lakes TMDL - Comfort Lake, Phosphorus	2030
Lake St. Croix Nutrient TMDL - Lake St. Croix, Phosphorus	2030